IN THE FEDERAL COURT FOR THE EASTERN DISTRICT OF VIRGINIA Criminal Division

UNITED STATES)
)
	<i>)</i>
v.) Case No.: 1:19 MJ 135
DREW IMPARATO)

MOTION TO REVOKE MAGISTRATE'S ORDER OF DETENTION AND REQUEST FOR A HEARING

COMES NOW, Defendant, Drew Imparato, by and through his attorney, Bruce A. Johnson, Jr. and moves this Honorable Court for his release on Personal Recognizance. In support thereof, Mr. Imparato avers as follows:

- 1. Defendant, Drew Imparato, is charged with knowingly travelling interstate with the intention to engage in illicit sexual conduct with a thirteen (13) year old child. There is only one alleged incident and only one alleged victim.
- 2. A preliminary and detention hearing was held on April 1, 2019 wherein bond was denied. The District Court should revoke the Detention Order of the Magistrate Court and Order Mr. Imparato 's release pending trial, as the defense has met its burden of showing that Mr. Imparato is neither a danger to society or a flight risk.
- 3. The charges occurred as a direct result of Mr. Imparato's admission of his conduct to school and police officials. During the pendency of the investigation, Mr. Imparato did not try to flee but rather buckled down with counseling, made school plans and developed a more balanced relationship with his Aunt with whom he resides in the District of Columbia.

- 4. In addition to cooperating fully, Mr. Imparato did not engage in any prohibited activity.
- 5. Mr. Imparato has no prior history of any violent or sexual crimes and no pending cases. Bond is appropriate.

WHEREFORE, for the aforementioned reasons, Defendant, Drew Imparato prays that this Court release him on personal recognizance.

Respectfully submitted,

BRUCE A. JOHNSON, JR., LLC

Bruce A. Johnson, Jr., Esq. (#36910)
4301 Northview Drive
Bowie, Maryland 20716
(301) 860-1505
Counsel for Defendant

REQUEST FOR HEARING

Defendant hereby requests a hearing on the Motion.

/s/	
Bruce A. Johnson, Jr.,	Esquire

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion to Revoke Magistrate's Order of Detention and Request for a Hearing was on this 11th day of April, 2019 via U.S. Mail to the Office of the United States Attorney for Virginia, 2100 Jamieson Ave., Alexandria, VA 22314.

/s/	
Bruce A. Johnson, Jr.	

THE DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Criminal Division		
united states v. drew imparato))) Case No.: 1:19 MJ 135)	
	ORDER	
UPON CONSIDERATION	of Petitioner's Motion to Revoke Magistrate's Order,	
it is thisday of	2019,	
ORDERED, that Defendant	's Motion to Revoke Magistrate's Order of Detention	
and Request for a Hearing is GF	RANTED; and it is further,	
ORDERED, that the hearing	shall be scheduled for	
	Judge District Court for the Eastern District of Virginia	
Copies to:		
Bruce A. Johnson, Jr., Esquire 4301 Northview Drive Bowie, Maryland 20716		
Office of the United States Atto 2100 Jamieson Ave. Alexandria, VA 22314	rney	